

EXHIBIT A

To Reply to Plaintiffs' Privilege Log Objections

From: Chris Bryant
To: La"Jessica Stringfellow; Rob Tyson; Lisle Traywick; Gore, John M.; Kenny, Stephen J.; Mathias, Andrew A.; Wells, Erica H.; Barber, Hamilton B.; Hollingsworth, Jennifer J.; Moore, Mark C.; Parente, Michael A.; Ricard, Rhett D.; Wilkins, William W.; Diamaduros, Konstantine P.; Trinkley, Jane; Crum, Liz; Burchstead, Michael; Nicholson, Thomas
Cc: Allen Chaney; Adriel I. Cepeda Derieux; Antonio Ingram; John Cusick; Leah Aden; Patricia Yan; Raymond Audain; Samantha Osaki; Gryll, Sarah; Somil Trivedi; Stuart Naifeh; Ramer, Paula; Freedman, John A.; Hindley, John; Fuisz, Jeffrey A.
Subject: SC NAACP v. Alexander - Plaintiffs Privilege Logs
Date: Friday, February 11, 2022 11:32:16 PM
Attachments: [SC NAACP v. McMaster Privilege Log \(US 171335936 2\).XLSX](#)

{EXTERNAL EMAIL}

Counsel:

Attached please find an Excel document that contains privilege logs for both the South Carolina State Chapter of the NAACP and Taiwan Scott. Please let me know if you have any issues with the document.

Chris



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Privilege Log - SC NAACP v. McMaster, Case No. 3:21-cv-03302-JMC-TJH-RMG (D.S.C.)						
Log #	Control Number	Control Bag Attach	Document Category	Author	Date Time Created	Date Time Last Modified
1	KEY00000025	KEY00000025	Word Doc	Leo Murphy	10/13/2021 19:22	2/2/2022 12:57
2	KEY00000027.0001	KEY00000027	Excel	NAACP Admin	12/28/2021 11:50	2/1/2022 14:52
3	KEY00000027.0002	KEY00000027	Word Doc	SC State Conference NAACP	2/2/2022 15:16	2/2/2022 15:16
4	KEY00000027.0003	KEY00000027	PDF		2/2/2022 15:31	2/2/2022 15:31
5	KEY00000027.0004	KEY00000027	PDF		2/2/2022 15:31	2/2/2022 15:31
6	KEY00000027.0005	KEY00000027	PDF		2/2/2022 15:31	2/2/2022 15:31
7	KEY00000029.0001	KEY00000029	Word Doc	Eloise Romby-Denson	9/18/2021 14:12	9/20/2021 2:50
8	KEY00000031.0001	KEY00000031	Word Doc	Leo Murphy	10/13/2021 19:22	2/2/2022 12:57

		Talton Scott [D-INST-ORGANIZATION/DOJ-EXCHANG-E-ADMINISTRATIVE-GROUP/PROBATION/23SPD1/C-N-RECEIPTS/[C4-000677FFB2D589]	Talton Scott	Talton Scott	2/2/2022 10:56 Quiet Question [721.msg]	AC	Confidential Attorney-Client email communication updating clients on redistricting case.
14	KET0000080	KET0000080 Email	Talton Scott [D-INST-ORGANIZATION/DOJ-EXCHANG-E-ADMINISTRATIVE-GROUP/PROBATION/23SPD1/C-N-RECEIPTS/[C4-000677FFB2D589]	Talton Scott	2/2/2022 10:56 Quiet Question [721.msg]	AC	Confidential Attorney-Client email communication updating clients on redistricting case.
15	KET0000081	KET0000081 Email	John Cusick [jcusick@macid.org]	John Cusick	10/10/2021 11:09 [talc@bouldercolorado.com]	[talc@bouldercolorado.com]	Brenda Murphy [brandonscott@macid.org]Stuart Waller [stuart.waller@macid.org]Leah Aden [leahaden@macid.org]Talton Scott [talton.scott@macid.org]Raymond Austin [raymond.austin@macid.org]Michelle Onyefter [michelle.onyefter@macid.org]Danielle Taddeo [danielle.taddeo@macid.org]Sarah Samantha Oishi [sarah.oishi@macid.org]Dan Borroughs [dan.borroughs@macid.org]
16	KET0000088	KET0000088 Email	John Cusick [jcusick@macid.org]	John Cusick	11/23/2021 11:08 [talc@bouldercolorado.com]	[talc@bouldercolorado.com]	Brenda Murphy [brandonscott@macid.org]Charles Boykin [charlesboykin@boulderlaw.com]Charles Boykin [charlesboykin@boulderlaw.com]Leah Aden [leahaden@macid.org]Raymond Austin [raymond.austin@macid.org]Danielle Taddeo [danielle.taddeo@macid.org]Sarah Samantha Oishi [sarah.oishi@macid.org]Dan Borroughs [dan.borroughs@macid.org]
17	KET0000088.001	KET0000088 PDF					Zachery Morris [zachery.morris@macid.org]
18	KET0000088.002	KET0000088 PDF					Zachery Morris [zachery.morris@macid.org]
19	KET0000089	KET0000089 Email	John Cusick [jcusick@macid.org]	John Cusick	11/12/2021 10:29 [gail@normit.com]	[gail@normit.com]	Leah Aden [leahaden@macid.org]Talton Scott [talton.scott@macid.org]Raymond Austin [raymond.austin@macid.org]Danielle Taddeo [danielle.taddeo@macid.org]Sarah Samantha Oishi [sarah.oishi@macid.org]Dan Borroughs [dan.borroughs@macid.org]
20	KET0000091	KET0000091 Email	Eloise Denson [eloisedenson@gmail.com]	Eloise Denson	11/12/2021 11:28 [john.cusick@macid.org]	[john.cusick@macid.org]	Zachery Morris [zachery.morris@macid.org]
21	KET0000092	KET0000092 Email	Felicie Denson [feliciedenson@gmail.com]	Felicie Denson	11/12/2021 11:25 [john.cusick@macid.org]	[john.cusick@macid.org]	Eloise Denson
22	KET0000093	KET0000093 Email	John Cusick [jcusick@macid.org]	John Cusick	11/12/2021 10:40 [john.cusick@macid.org]	[john.cusick@macid.org]	Eloise Denson
23	KET0000094	KET0000094 Email	John Cusick [jcusick@macid.org]	John Cusick	11/12/2021 10:40 [john.cusick@macid.org]	[john.cusick@macid.org]	Eloise Denson
24	KET0000095	KET0000095 Email	John Cusick [jcusick@macid.org]	John Cusick	11/12/2021 10:40 [john.cusick@macid.org]	[john.cusick@macid.org]	Eloise Denson
25	KET0000095	KET0000095 Email	John Cusick [jcusick@macid.org]	John Cusick	11/15/2021 11:48 [talc@bouldercolorado.com]	[talc@bouldercolorado.com]	Eloise Denson
26	KET0000097	KET0000097 Email	John Cusick [jcusick@macid.org]	John Cusick	11/23/2021 11:08 [talc@bouldercolorado.com]	[talc@bouldercolorado.com]	Eloise Denson
27	KET0000097.001	KET0000097 PDF					Zachery Morris [zachery.morris@macid.org]
28	KET0000097.002	KET0000097 PDF					Zachery Morris [zachery.morris@macid.org]
29	KET0000110	KET0000110 Email	Brandi Murphy [brandimurphy@gmail.com]	Brandi Murphy	1/2/24/2021 11:43 [leah.aden@macid.org]	[leah.aden@macid.org]	Brenda Murphy [brandonscott@macid.org]

30	KEN0000111	KEN0000111	Email	Brenda Murphy [brendamurphy@gmail.com]	12/29/2021 14:43	Leah Aden [laden@nacdp.org]	Taiwan Scott [tai@hotmail.com]; Leah Aden [laden@nacdp.org]	tai@hotmail.com; John Cusick [jcusick@nacdp.org]; Antonio Ingan [ingan@nacdp.org]	2/2/2022 10:54	Re_FVU_ECF_Notification for Mater_084-00052-21-cv	AC	Confidential Attorney-Client email communication updating clients on redistricting case.
31	KEN0000112	KEN0000112	Email	John Cusick [jcusick@nacdp.org]	10/12/2021 12:48	Taiwan Scott [tai@hotmail.com]; Leah Aden [laden@nacdp.org]		John Cusick	2/2/2022 10:54	RE_LDF_SC_HACP_ACLU_and ACLU_of_SC_Proposed_Redistricting_Maps(17).m48	AC/AVP	Confidential Attorney-Client email chain communication updating clients on redistricting case containing attorney thoughts and impressions
32	KEN0000113	KEN0000113	Email	John Cusick [jcusick@nacdp.org]	10/10/2021 16:12	Taiwan Scott [tai@hotmail.com]; Leah Aden [laden@nacdp.org]		John Cusick	2/2/2022 10:54	RE_LDF_SC_HACP_ACLU_and ACLU_of_SC_Proposed_Redistricting_Maps(22).m48	AC/AVP	Confidential Attorney-Client email chain communication updating clients on redistricting case containing attorney thoughts and impressions
33	KEN0000114	KEN0000114	Email	Leah Aden [laden@nacdp.org]	10/10/2021 14:26	Taiwan Scott [tai@hotmail.com]; Leah Aden [laden@nacdp.org]		John Cusick [jcusick@nacdp.org]	2/2/2022 10:54	RE_LDF_SC_HACP_ACLU_and ACLU_of_SC_Proposed_Redistricting_Maps(23).m48	AC/AVP	Confidential Attorney-Client email chain communication updating clients on redistricting case containing attorney thoughts and impressions
34	KEN0000115	KEN0000115	Email	[laden@nacdp.org]	10/10/2021 14:23	Taiwan Scott [tai@hotmail.com]		John Cusick [jcusick@nacdp.org]	2/2/2022 10:54	RE_LDF_SC_HACP_ACLU_and ACLU_of_SC_Proposed_Redistricting_Maps(23).m48	AC/AVP	Confidential Attorney-Client email chain communication updating clients on redistricting case containing attorney thoughts and impressions
35	KEN0000119	KEN0000119	Email	[tai@nacdp.org]	10/11/2021 17:51	Taiwan Scott [tai@hotmail.com]		Leah Aden	2/2/2022 10:54	RE_LDF_SC_HACP_ACLU_and ACLU_of_SC_Proposed_Redistricting_Maps(23).m48	AC/AVP	Confidential Attorney-Client email chain communication updating clients on redistricting case containing attorney thoughts and impressions
36	KEN0000121	KEN0000121	Email	[tai@nacdp.org]	10/11/2021 17:51	Taiwan Scott [tai@hotmail.com]		Leah Aden	2/2/2022 10:54	RE_LDF_SC_HACP_ACLU_and ACLU_of_SC_Proposed_Redistricting_Maps(23).m48	AC/AVP	Confidential Attorney-Client email chain communication updating clients on redistricting case containing attorney thoughts and impressions
37	KEN000013120001	KEN0000132	Email	DON BRASHEARS [donbrashears@nacdp.org]	10/10/2021 22:31	Taiwan Scott [tai@hotmail.com]		Leah Aden	2/2/2022 10:54	RE_LDF_SC_HACP_ACLU_and ACLU_of_SC_Proposed_Redistricting_Maps(23).m48	AC/AVP	Confidential Attorney-Client email chain communication updating clients on redistricting case containing attorney thoughts and impressions
38	KEN00001320004	KEN0000132	Email	Leah Aden [laden@nacdp.org]	10/24/2021 15:41	Taiwan Scott [tai@hotmail.com]		Leah Aden	2/2/2022 10:54	RE_LDF_SC_HACP_ACLU_and ACLU_of_SC_Proposed_Redistricting_Maps(23).m48	AC/AVP	Confidential Attorney-Client email chain communication updating clients on redistricting case containing attorney thoughts and impressions
39	KEN00001320005	KEN0000132	Email	Brenda Murphy [brendamurphy@gmail.com]; Leah Aden [laden@nacdp.org]	10/24/2021 14:43	Taiwan Scott [tai@hotmail.com]		Leah Aden	2/2/2022 10:54	RE_LDF_SC_HACP_ACLU_and ACLU_of_SC_Proposed_Redistricting_Maps(23).m48	AC/AVP	Confidential Attorney-Client email chain communication updating clients on redistricting case containing attorney thoughts and impressions
40	KEN00001320007	KEN0000132	Email	John Cusick [jcusick@nacdp.org]	10/22/2021 17:30	Taiwan Scott [tai@hotmail.com]		Leah Aden	2/2/2022 10:54	RE_LDF_SC_HACP_ACLU_and ACLU_of_SC_Proposed_Redistricting_Maps(23).m48	AC/AVP	Confidential Attorney-Client email chain communication updating clients on redistricting case containing attorney thoughts and impressions
41	KEN00001320007	KEN0000132	Email	[laden@nacdp.org]	10/22/2021 17:30	Taiwan Scott [tai@hotmail.com]		Leah Aden	2/2/2022 10:54	RE_LDF_SC_HACP_ACLU_and ACLU_of_SC_Proposed_Redistricting_Maps(23).m48	AC/AVP	Confidential Attorney-Client email chain communication updating clients on redistricting case containing attorney thoughts and impressions
42	KEN00001320008	KEN0000132	Email	John Cusick [jcusick@nacdp.org]	10/22/2021 17:30	Taiwan Scott [tai@hotmail.com]		Leah Aden	2/2/2022 10:54	RE_LDF_SC_HACP_ACLU_and ACLU_of_SC_Proposed_Redistricting_Maps(23).m48	AC/AVP	Confidential Attorney-Client email chain communication updating clients on redistricting case containing attorney thoughts and impressions
43	KEN00001330001	KEN0000132	Word Doc					Leah Aden	2/2/2022 10:54	RE_LDF_SC_HACP_ACLU_and ACLU_of_SC_Proposed_Redistricting_Maps(23).m48	AC/AVP	Confidential Attorney-Client email chain communication updating clients on redistricting case containing attorney thoughts and impressions
44	KEN00001340001	KEN0000134	Email	Leah Aden [laden@nacdp.org]	10/09/2021 15:45	Taiwan Scott [tai@hotmail.com]		Leah Aden	2/2/2022 10:54	RE_LDF_SC_HACP_ACLU_and ACLU_of_SC_Proposed_Redistricting_Maps(23).m48	AC/AVP	Confidential Attorney-Client email chain communication updating clients on redistricting case containing attorney thoughts and impressions
45	KEN00001350001	KEN0000135	Email	Leah Aden [laden@nacdp.org]	10/09/2021 15:45	Taiwan Scott [tai@hotmail.com]		Leah Aden	2/2/2022 10:54	RE_LDF_SC_HACP_ACLU_and ACLU_of_SC_Proposed_Redistricting_Maps(23).m48	AC/AVP	Confidential Attorney-Client email chain communication updating clients on redistricting case containing attorney thoughts and impressions
46	KEN00001360001	KEN0000136	Email	John Cusick [jcusick@nacdp.org]	11/12/2021 3:40	Taiwan Scott [tai@hotmail.com]		Leah Aden	2/2/2022 10:54	RE_LDF_SC_HACP_ACLU_and ACLU_of_SC_Proposed_Redistricting_Maps(23).m48	AC/AVP	Confidential Attorney-Client email chain communication updating clients on redistricting case containing attorney thoughts and impressions
47	KEN00001360002	KEN0000136	Email	John Cusick [jcusick@nacdp.org]	11/15/2021 2:45	Taiwan Scott [tai@hotmail.com]		Leah Aden	2/2/2022 10:54	RE_LDF_SC_HACP_ACLU_and ACLU_of_SC_Proposed_Redistricting_Maps(23).m48	AC/AVP	Confidential Attorney-Client email chain communication updating clients on redistricting case containing attorney thoughts and impressions
48	KEN00001360003	KEN0000136	Email	John Cusick [jcusick@nacdp.org]	11/12/2021 2:45	Taiwan Scott [tai@hotmail.com]		Leah Aden	2/2/2022 10:54	RE_LDF_SC_HACP_ACLU_and ACLU_of_SC_Proposed_Redistricting_Maps(23).m48	AC/AVP	Confidential Attorney-Client email chain communication updating clients on redistricting case containing attorney thoughts and impressions

